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Office of the Secretary  
Federal Communications Commission  
Washington DC 20554

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Subject: Comments on NPRM 93-305

Date: 3/4/94

I have enclosed my comments on the Notice of Proposed Rulemaking 93-305, Amendment of the Amateur Service Rules to Implement a Vanity Call Sign System.

I have enclosed an original plus 9 copies so that each Commissioner may have a copy.

Sincerely,

  
John M. C. Covington, III  
P.O. Box 217122  
Charlotte NC 28221-7122

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MAR 07 1994

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the matter of )  
 )  
Amendment of the Amateur ) PR Docket 93-305  
Service Rules to Implement a )  
Vanity Call Sign System )

To: The Commission

COMMENTS OF John M. C. Covington, III  
P. O. Box 217122  
Charlotte NC 28221-7122

Date: 3/4/94

#### Summary

1. I am in agreement with the proposal to implement a Vanity Call Sign System. I am in favor of a one-time fee rather than a fee which will be paid at initial application and at each renewal. The vanity call sign fee should only be collected if a different call sign is actually assigned. I believe that the Vanity Call Sign System should be implemented in stages starting with requests for previously held call signs, then in stages according to Operator License class. The Commission should accept a list of more than 10 preferred call signs if such a list is submitted on magnetic media. I have proposed one possible format for such an electronic submission.

#### Discussion

2. I am an Amateur Radio licensee of 22 years, and presently hold the Amateur Extra class license. I expect that I will

apply for a Vanity Call sign at some time in the future, so this proposal will affect me directly. I took advantage of an opportunity in 1978 to request a previously held call sign, which this proposal will allow others to do if implemented.

3. The current proposal states that upon application for a Vanity Call sign, the applicant's current call sign will be vacated, then the first available call sign from the applicant's list would be assigned. If none of the call signs on this list were available, the automated process would reassign the call sign that the applicant vacated. This seems to imply that if the applicant's vacated call sign was reassigned, that it would then be considered a vanity call sign and subject to fee. I feel that an applicant should only be assessed the fee if his call sign was changed as a result of the application.

4. I would prefer that the vanity call sign fee be a one-time fee rather than paying on application and at each renewal time; even if the vanity call sign fee were made larger. Renewals of vanity call signs should take no more effort than standard renewals; in fact insisting that vanity call sign renewals be made on different forms than standard renewals will create additional work for Commission staff; lessening the profitability of the vanity call signs for the commission.

5. The vanity call sign system should be implemented in phases in order to keep the workload to something that will be manageable by the Commission. The first phase should allow amateurs to request any call sign that they have previously held, and to allow trustees of existing club station licenses to apply for a vanity call sign for the club station license. The next phase should be to add holders of each license class to the group of amateurs eligible to participate in the vanity call sign system. I propose that this be done in the following order: Amateur Extra Class licensees, then Advanced Class, then General Class, then Technician Class, and finally everybody.

6. I would like to see the Commission allow for vanity call sign requests to be submitted on magnetic computer disks. This would allow individuals to submit lists of preferred call signs which are much larger than the 10 currently proposed; and an automated system could then process such a list without tying up Commission labor manually keying in lists of call signs. I propose that the Commission allow at least the following format to be submitted:

MS-DOS 1.44 Megabyte 3.5" floppy disk, containing a single file called "CALLSIGN.TXT". This file will contain a list of preferred call signs, each separated by a carriage return/line feed character sequence

(effectively a plain text file with one call sign on each line).

The Commission computer could read this file, one line at a time, and compare the call sign with the Commission database for availability, until an available call sign was found. Other forms of magnetic media (such as Apple Macintosh) should be considered, but this is one that would be easy for many Amateur Radio Operators to submit.

#### Conclusion

7. I find myself in general agreement with the proposal outlined in the Notice of Proposed Rulemaking; but I would like to see the Commission clarify whether the fee will be charged to applicants whose call sign is not changed. I strongly support the idea of the Commission perform some of its licensing procedures using electronic data transfers, including vanity call sign applications and even applications for initial licenses.